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May 1, 2007

Via electronic filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SE
Washington, DC 20554

Re: Cable & Communications Corporation
CC Docket No. 94-102
May 1, 2007 Report

Dear Ms. Dortch:

Pursuant to the Commission's *Order*,¹ Cable & Communications Corporation ("C&CC") hereby submits the following report on its progress in achieving the goal of 95% penetration of ALI-capable handsets among its subscribers.

Summary

In its progress report filed herein on May 1, 2006, C&CC reported an ALI-compliant handset penetration rate of 47%. One year later, as a result of its focused and aggressive marketing efforts, C&CC has almost doubled its penetration rate: as of April 16, 2007, the penetration rate has grown to 80%. Although it has increased its penetration rate by approximately 9% since February, 2007, C&CC has, unfortunately, failed to meet its revised projected benchmark of 85%. Because only approximately five (5) months remain to meet its current deadline of September 23, 2007, C&CC again voices its concern that, despite its concerted efforts, a further extension may be necessary. Remaining analog subscribers continue to resist the educational and marketing programs designed to encourage conversion to compliant handsets. C&CC has and will maintain its diligent and focused education and marketing efforts, review the efficacy of various programs and consider alternative outreach efforts.

In accordance with paragraph 21 of the *Order* and its past practices, C&CC continues to coordinate with area PSAPs and other emergency service providers, keeping them apprised of its activities and progress in meeting handset penetration goals. This information is shared formally through serving PSAPs with copies of all FCC filings related to this issue, as well as informally, through occasional telephone conversations and meetings.

In recognition of the remaining condition imposed by paragraph 21 of the *Order*, C&CC reports also its continuing regular reminders to subscribers that upgrading their analog handsets will enable them to transmit their location information automatically once PSAPs have implemented Phase II E911 capabilities. In addition, C&CC will inform subscribers when Phase I and Phase II requests are received from PSAPs, and will provide regular updates regarding the anticipated implementation dates.

¹ *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, Cable & Communications Corporation Petition for Waiver of Section 20.18(g)(1)(v) of the Commission's Rules, *Order*, FCC 06-39 (rel. Mar. 23, 2006) ("*Order*"). The *Order* granted Cable & Communications Corporation ("C&CC") an extension of 18 months after its release to meet the requirement of Section 20.18(g)(1)(v) that 95% of the handsets used by its subscribers be location-capable, subject to specific conditions and reporting requirements. The instant report is the third required under the *Order*.

Report

Pursuant to paragraph 22 of the *Order*, C&CC provides the following information:

(1) The number and status of Phase II requests from PSAPs (including those requests it may consider invalid):

C&CC has received no official Phase I or Phase II request from any PSAP.

(2) The estimated dates on which Phase II service will be available to PSAPs served by its network:

C&CC provides cellular service to a geographic area served by nine (9) different PSAPs in Montana and one in North Dakota. Each Montana PSAP is willing to work with C&CC regarding the timing for implementation of a Phase I or Phase II request. C&CC's May 1, 2006 Report provided detailed information regarding the status of E-911 implementation plans for each PSAP, and the company has updated that information in its subsequent reports. The following information reflects reported modifications to anticipated PSAP implementation readiness plans reported previously:

PSAP

Anticipated PSAP Implementation Date

Miles City Police Dept.

Wireline Enhanced 911 now available; anticipate approximately one year for wireless Phase I capability

Garfield Co. Sheriff

Phase I and Phase II capable as of February 12, 2007; will continue to work with cellular providers until they become ready to provide service

Glendive Police Dept.

Phase I active; no specific dates for Phase II implementation (possibly late 2007); no plans to make Phase I or Phase II requests of C&CC at this time

Powder River Co. Sheriff

Phase I implementation scheduled for June, 2007. No current estimate regarding Phase II. No immediate plans to make Phase I or Phase II requests of wireless carriers

Richland County Sheriff

Phase I compatible currently; anticipate Phase II compatibility by late 2007 or early 2008; no immediate plans to make Phase I or Phase II requests of wireless carriers

(3) The status of its coordination efforts with PSAPs for alternative 95% handset penetration dates

As reported above, all PSAPs have been informed of the extension until September 23, 2007, or eighteen months after the release of the *Order*. All Montana PSAPs have indicated a willingness to work closely with C&CC regarding Phase II implementation schedules.

(4) Efforts to encourage customers to upgrade to location-capable handsets:

C&CC continues its two-prong approach to encouraging customers to upgrade their handsets through subscriber education and the provision of subscriber upgrade incentives.

C&CC continues its marketing campaign to encourage utilization of a digital handset, offering a free phone and free activation to analog subscribers who trade existing equipment for a compliant digital phone, plus a \$50 usage credit. Contract commitments are still required.

In addition, C&CC continues to advertise its conversion program over local radio. Posters promoting the campaign are displayed in each business office, and at recent open house promotional campaigns. Billing inserts and cable advertising are also utilized to remind subscribers of the benefits of digital upgrades. Examples of advertising and outreach efforts are attached. All promotions and upgrade incentive programs, as well as customer educational information, is also available on C&CC's web site.

C&CC continues its build-out program to improve service. The FCC recently granted C&CC's application to construct and operate a new site in Alzada, Montana, and the construction of two additional sites are contemplated this year.

(5) Percentage of customers with location-capable phones:

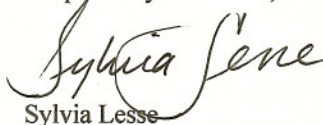
C&CC reports that 80% of its customers had location-capable phones as of April 16, 2007.

(6) Status in achieving compliance and whether it is on schedule to meet the revised deadline

C&CC reports its inability to meet the revised 85% penetration goal for this reporting period. Since continuing programs have not resulted in significantly increased additional conversion, C&CC must consider the likelihood that additional time will still be required to meet the 95% benchmark. Although C&CC is considering alternative methods to stimulate conversion, it anticipates that it will soon be forced to seek a further extension of time within which to reach the 95% penetration rate.

Please direct any questions or correspondence concerning this matter to this office.

Respectfully submitted,


Sylvia Lesse

Mid-Rivers Telephone Cooperative, Inc., dba



30-sec “Open House” radio ad

Created 2/20/07

Mid-Rivers Cellular invites you to an open house Tuesday, March, 6th from 9-5 at our Baker Service Center. Sign for a new cellular service plan or extend an existing contract and choose from a FREE RAZR or LG5000 digital cell phone. Trade in an analog bag or handheld phone and choose from a FREE RAZR or LG5000 AND receive a \$50 credit. Stop by and enjoy refreshments and register for door prizes. See you Tuesday, March 6th from 9-5 at 11 East Montana Ave in Baker.

Sign for a new cellular service plan, extend an existing contract (2 years) or trade in an analog phone and receive a **FREE LG5000!**

Cellular Plans to fit your lifestyle!

Value Plans:

FREE FreedomWest (from a Mid-Rivers or Sagebrush tower call MT, ND, SD and WY toll-free)

Value Added Plans:

- **Unlimited Anytime Home Airtime Minutes and Free Minutes for Nationwide Roaming**
- **Unlimited Nationwide Long Distance from any Mid-Rivers or Sagebrush Home Tower**
- **Free Calling Features and Caller ID**

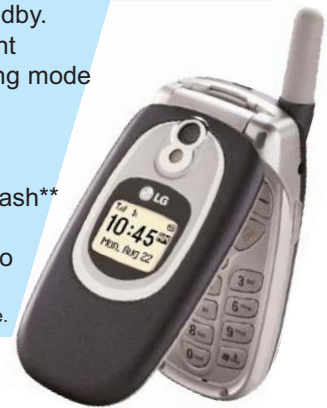
Special Features of the LG5000:

- Battery Life of 3 hrs. talk time/6 days standby.
- Monochrome LCD external display on front
- Voice dialing with voice command & driving mode
- Phone book capacity of 500
- Vibrate
- Picture ID and ringer ID
- Camera with 640x480 resolution & LED flash**
- Video capture 15 seconds**
- Alarm, Calculator, Calendar & Voice memo
- Speaker phone

**Additional equipment needed to download from phone.

Extended Coverage!

**Offer expires
February 28th!**



Turn this over for more information about Mid-Rivers Cellular.

Mid-Rivers Cellular • 1-800-452-2288 • www.midrivers.com

To take advantage of the future implementation of Phase II E-911 automatic location capabilities, you must have a digital cellular phone. If, during an emergency, you are unable to give your location to the PSAPs (911 centers), that information will be sent automatically from a digital cellular phone. Therefore, it is recommended that you procure a digital cellular phone as soon as possible.

Turn this over for information about Mid-Rivers Cellular's latest cellular promotion.



30-sec " Free RAZR or RAZR 3m" radio ad
Created 2/28/07

Mid-Rivers Cellular March madness – receive a FREE RAZR, LG5000 or purchase a RAZR 3m and data kit for \$25.00 when you sign for a new cellular plan, extend an existing contract or trade in your analog bag phone. To sign for Mid-Rivers Cellular stop by your local Mid-Rivers Customer Service office or call 1-800-452-2288. "We're Mid-Rivers, service plus your community partner."

Mid-Rivers Cellular Spring Showers bring a NEW Cellular Phone!

Sign for a new cellular service plan, extend an existing contract*, or trade in an active analog phone, and receive a FREE phone - choose from...



**FREE
RAZR V3c**

**FREE
V266**



**FREE LG
5000**



**FREE
E815**



**RAZR V3m
with data kit
for \$25**



**Sign for text
messaging and
receive the first
month FREE!**

BONUS:
\$50 credit on your
next bill when you trade
in an active analog cell
phone!

**Announcing LOWER PRICING on
additional phones!**

Existing phones at \$13.95 now **\$9.95!**

Existing phones at \$10.95 now **\$8.95!**

New rates starting April 1st

*Two-year contract and/or extensions are required. Existing contracts with 12 months or less remaining on contract are eligible for the promotional free phone with a two-year extension; existing contracts with 13 months or more remaining on contract are eligible for a promotional phone at 1/2 price with a two-year extension.

1-800-452-2288

Mid-Rivers

C E L L U L A R

**Offer expires
May 31st!**



Sign for a new cellular service plan, extend an existing contract*, or trade in an active analog phone, and receive a FREE phone - choose from...**

**FREE
RAZR V3c****FREE
V266****FREE
LG 5000****RAZR V3m
with data kit
for \$25****FREE
E815****Offer expires
May 31st!****Sign for text messaging and
receive the first month FREE!****Announcing LOWER PRICING on
additional phones!**Existing phones at \$13.95 now **\$9.95!**Existing phones at \$10.95 now **\$8.95!****New rates starting April 1st**

*Two-year contract and/or extensions are required. Existing contracts with 12 months or less remaining on contract are eligible for the promotional free phone with a two-year extension; existing contracts with 13 months or more remaining on contract are eligible for a promotional phone at 1/2 price with a two-year extension.

**Receive a \$50 credit with trade-in of an active analog cell phone.

Turn this over for more information about Mid-Rivers Cellular.

Mid-Rivers Cellular • 1-800-452-2288 • www.midrivers.com

To take advantage of the future implementation of Emergency location capabilities, you must have a digital cellular phone. If, during an emergency, you are unable to give your location to the 911 centers, that information will be sent automatically from a digital cellular phone. Therefore, it is recommended that you procure a digital cellular phone as soon as possible.

611 SERVICE INFORMATION

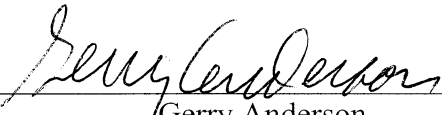
Mid-Rivers Customers:
When dialing 611, you will be connected to Mid-Rivers' Technical Assistance Center; when roaming on another provider's tower, you will be routed to Mid-Rivers as long as the provider subscribes to the 611 service.

Turn this over for information about Mid-Rivers Cellular's latest cellular promotion.

DECLARATION OF GERRY ANDERSON

I, Gerry Anderson, General Manager of Cable & Communications Corporation, do hereby declare under penalty of perjury that I have read the foregoing "May 1, 2007 Report" and that the facts stated therein are true and correct, to the best of my knowledge, information and belief.

April 30, 2007
Date



Gerry Anderson

Certificate of Service

I, Sylvia Lesse, of Communications Advisory Counsel, LLC, hereby certify that on this 1st day of May, 2007, I caused to be delivered, via first-class US mail, postage prepaid, a copy of the foregoing "May 1, 2007 Report" on the following:

Captain Kevin Krausz
Miles City Police Dept.
PSAP for Custer County, Montana
PSAP for Garfield County, Montana
2420 Bridge Street
Miles City MT 59301

Sheriff Kelly Pierson
Garfield County Sheriff's Office
PO Box 103
Jordan MT 59337

Chief Alan Michaels
Glendive Police Department
PSAP for Dawson County, Montana
PO Box 1372
Glendive MT 59330

Chuck Lee
PSAP Manager - Fallon County
PSAP for Fallon, Carter,
Prairie and Wibaux Co's, MT
PO Box 1061
Baker, MT 59313

Sheriff Rusty Jardee
Carter County Sheriff
PO Box 323
Ekalaka MT 59324

Russ Lindblom
North Dakota 911 Manager
PO Box 877
Bismarck, ND 58502-0877

Jeff Cohen*
Public Safety & Homeland Security Bureau
Federal Communications Commission
445 Twelfth St, SW
Washington, DC 20554

Dana Shaffer, Deputy Chief*
Public Safety & Homeland Security Bureau
Federal Communications Commission
445 Twelfth St., SW
Washington, DC 20554

* Via electronic mail

Sheriff William Klunder
Prairie County Sheriff's Office
PO Box 126
Terry MT 59349

Sheriff Darby S. Harrington
Wibaux County Sheriff's Office
PO Box 322
Wibaux MT 59353

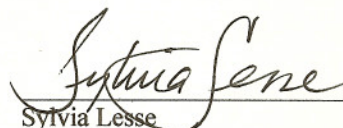
Sheriff Dave Harris
McCone County Sheriff's Office
PSAP for McCone County, Montana
905 B Avenue, PO Box 201
Circle, MT 59215

Sheriff John Blain
Powder Riv. Co. Sheriff's Office
PSAP for Powder River Co., MT
Box 71 Courthouse Square
Broadus MT 59317

Sheriff Brad Baisch
Richland County Sheriff's Office
PSAP for Richland Co., MT
110 2nd Ave NW
Sidney, MT 59270

Lisa Solf
Petroleum County PSAP
PO Box 226
Winnett, MT 59087

Jim Kenner, IT Dept.
Rosebud County Sheriff's Office
Box 85 180 S 13th St
Forsyth, MT 59327


Sylvia Lesse